

This Petition for Rulemaking is so poorly drafted that it must be rejected. There are at least three major faults with the Petition as filed by the ARRL. First, it redefines bandwidth in such a manner as to be meaningless. Second, it uses expressions that are not defined. Finally, the Petition proposes to allow semiautomatic operation to occur throughout the Amateur bands. Each of these is discussed below.

The new proposed Section 97.3(a)(8) defines bandwidth as "[f]or a given class of emission, the width of the frequency band which is just sufficient to ensure the transmission of information at the rate and with the quality required under specified conditions." At present Section 97.3(a)(8) defines bandwidth as "[t]he width of a frequency band outside of which the mean power of the transmitted signal is attenuated at least 26 dB below the mean power of the transmitted signal within the band." While "a given class of emission" is undefined (see below) it appears to mean one of the various maximum bandwidths allowed for the various sub-bands or specifically, one of 200 Hz, 500 Hz, 2.8 kHz, 3.5 kHz, 9 kHz, or 16 kHz. Under the current bandwidth definition, a signal that has a 2.8 kHz bandwidth must be attenuated by at least 26 dB at the frequency edges of the signal. Under the proposed definition of bandwidth, there is no such requirement. If the signal were attenuated by .0000001 dB (or less) at its frequency edges as long as the signal width was "just sufficient to ensure the transmission of information at the rate and with the quality required under specified conditions" it would meet the proposed bandwidth definition. That same signal might be attenuated by 26 dB at 2.8 kHz and still meet the requirements for a 200 Hz

bandwidth signal as long as it was "just sufficient to ensure the transmission of information at the rate and with the quality required under specified conditions." This means that a normal SSB signal (or any other legal signal) whose bandwidth was "just sufficient to ensure the transmission of information at the rate and with the quality required under specified conditions" could be transmitted anywhere in the Amateur bands. In a word, this removes all restrictions for signals of any bandwidth anywhere within the Amateur radio bands.

The Petition proposes language for Section 97.3(a)(8) using the language "a given class of emission." The Petition proposes language for Section 97.3(a)(42) using the language "allocated frequency band." These terms are not defined in the existing Part 97 nor are they defined in the proposed change. Failure to clearly state what these terms mean leads to confusion and dispute.

The Petitioner concedes that what is commonly referred to as "fully automatic control" is problematic in the HF bands (see Paragraph 15 of the Petition for Rule Making). The reason that this type of operation is a problem is that stations operating under such control can and do initiate transmissions that interfere with ongoing communications. This point is conceded in Paragraph 15. Then the proposed change tries to reason that what is commonly called "semi-automatic control" should be allowed to operate freely within the HF sub-bands where other similar bandwidth operation is allowed (see Paragraph 16 of the Petition for Rule Making). Unfortunately, stations operating under semi-automatic control can and do interfere with ongoing communications as well. While one of the stations

operating under  
semi-automatic control has an operator present who can insure the particular  
frequency is  
not being used, the station without an operator present does not do so. It  
is very common  
in high frequency operation that only one end of a two-way communication can  
detect that  
a particular frequency is in use. If the only end that could make this  
determination is  
the station without an operator being present, then the ongoing  
communications will  
experience interference. This is not a hypothetical point as it does  
currently happen with  
great frequency. The obvious solution is to segment both fully automatic and  
semi-automatic  
operation to a small portion of the available frequency bands to preclude  
such interference.

For the reasons as stated above, this Petition for Rulemaking must be  
rejected.

Robert Campbell  
W0MT

-----=\_NextPart\_000\_0001\_01C6181E.8580BCD0

Content-Type: text/html;

charset="us-ascii"

Content-Transfer-Encoding: quoted-printable

<!DOCTYPE HTML PUBLIC "-//W3C//DTD HTML 4.0 Transitional//EN">

<HTML><HEAD>

<META http-equiv=3DContent-Type content=3D"text/html;

charset=3Dus-ascii">

<META content=3D"MSHTML 6.00.2900.2802" name=3DGENERATOR></HEAD>

<BODY>

<DIV>

<DIV>

<DIV><FONT face=3DArial size=3D2>ECFS - E-mail

Filing<BR>&lt;PROCEEDING&gt;<SPAN

class=3D265444419-12012006>RM-  
class=3D218464715-13012006>3  
Campbell  
Road  
ZIP;80403  
t;  
class=3D265444419-12012006>OP  
BR>  
BR>  
title=3D"BLOCKED::mailto:mtrobt@earthlink.net  
.net"

href=3D"blocked::mailto:mtrobt@earthlink.net">  
title=3DBLOCKED::mailto:mtrobt@earthlink.net face=3DArial  
size=3D2>mtrobt@earthlink.net

<BR>&nbsp; This Petition for Rulemaking is so  
poorly drafted

that it must be rejected. There are at  
the

Petition as filed by the ARRL. First, it

class=3D265444419-12012006>re  
class=3D265444419-12012006>in such a manner as to be meaningless.

Second,

it uses expressions that are  
proposes to

allows semiautomatic operation to occur  
throughout the Amateur bands.

Each of

these is discussed below.  
97.3(a)(8) defines bandwidth as "[f]or a given class of emission,  
width

of the frequency band which is just sufficient to ensure the  
transmission

of  
specified

conditions." At  
"[t]he width

of a frequency band outside  
transmitted signal

is attenuated at least 26 dB below the  
signal

within the band." While "a given class of emission" is

below)

it appears to mean one of the various maximum bandwidths allowed for the

various sub-bands or specifically, one of 200 Hz, 500 Hz, 2.8 kHz, 3.5 kHz, 9

kHz, or 16 kHz. Under the current bandwidth definition, a signal that has

a  $\leq 2$  kHz bandwidth must be attenuated by at

least 26 dB at the frequency edges of the signal. Under the proposed definition of bandwidth, there is no such requirement. If the signal

were attenuated by  $\geq 0.000001$  dB (or less) at its frequency edges as long as

the signal width was "just sufficient to ensure the transmission of information at the rate and with the quality required under specified

conditions" it would meet the proposed

bandwidth definition. That same

signal might be  $\leq 8$  kHz

attenuated by 26 dB at a  $\leq 2$  kHz

bandwidth and still meet the requirements for a 200

Hz bandwidth signal

as long as it was "just sufficient to ensure the transmission of information at the rate and

with the quality required under specified conditions." This means that a

normal SSB signal

with the quality required under specified conditions." This means that a

normal SSB signal

with the quality required under specified conditions." This means that a

</SPAN>(or any other legal signal) whose bandwidth was "just sufficient to

ensure the</FONT></DIV>

<DIV><FONT face=3DArial size=3D2>transmission<SPAN class=3D265444419-12012006>

</SPAN>of information at the rate and with the quality required under specified

conditions"</FONT></DIV>

<DIV><FONT face=3DArial size=3D2>could<SPAN class=3D265444419-12012006>&nbsp;</SPAN>be

transmitted anywhere in the Amateur bands. In a word, this removes all restrictions for<BR>signals of any bandwidth anywhere within the Amateur radio

bands.</FONT></DIV>

<DIV><FONT face=3DArial size=3D2></FONT>&nbsp;</DIV>

<DIV><FONT face=3DArial size=3D2>&nbsp; The Petition proposes language for Section

97.3(a)(8) using the language "a given class<BR>of emission." The Petition

proposes language for Section 97.3(a)(42) using the language<BR>"allocated

frequency band." These terms are not defined in the existing Part 97 nor are

they<BR>defined in the proposed change. Failure to clearly state what these

terms mean leads to<BR>confusion and dispute.</FONT></DIV>

<DIV><FONT face=3DArial size=3D2></FONT>&nbsp;</DIV>

<DIV><FONT face=3DArial size=3D2>&nbsp; The Petitioner concedes than what is

commonly referred to as "fully automatic control" is<BR>problematic in the HF

bands (see Paragraph 15 of the Petition for Rule Making). The reason<BR>that

this type of operation is a problem is that stations operating under such

control can<BR>and do initiate transmissions that interfere with ongoing

communications. This point is<BR>conceded in Paragraph 15. Then the proposed

change tries to reason that what is commonly called "semi-automatic control"

should be allowed to operate freely within the HF sub-bands where other

similar bandwidth operation is allowed (see Paragraph 16 of the Petition

for Rule Making). Unfortunately, stations operating under semi-automatic

control can and do interfere with ongoing communications as well.

While one

of the stations operating under semi-automatic control has an operator

present who can insure the particular frequency is not being used, the

station without an operator present does not do so. It is very common in high

frequency operation that only one end of a two-way communication can detect

that a particular frequency is in use. If the only end that could make this

determination is the station without an operator being present, then the

ongoing communications will experience interference. This is not a hypothetical point as it does currently happen with great frequency.

The

obvious solution is to segment both fully automatic and

semi-automatic operation to a small portion of the available frequency bands

to preclude such interference.

For the reasons as stated above, this Petition for

Rulemaking must be rejected.

Robert

Campbell

W0MT

-----=\_NextPart\_000\_0001\_01C6181E.8580BCD0--